

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DAVID McKINNEY, individually,	)	
ANITA McKINNEY, individually, h/w,	)	
	)	
Plaintiffs,	)	C.A. NO. 06C-208-SLR
	)	
v.	)	
	)	
PAUL J. MELINARI, individually, and	)	
FINANCIAL SERVICE VEHICLE TRUST,	)	
a foreign corporation,	)	
	)	
Defendants.	)	

**NOTICE OF DEPOSITION DUCES TECUM**

TO: David P. Cline, Esquire  
1300 N. Market Street, Suite 700  
Wilmington, DE 19801

PLEASE TAKE NOTICE that the undersigned attorney will take the **records** deposition  
of the following on ***February 16, 2007 at 10:00 a.m.*** in the office of the undersigned.\*

- 1) Nationwide Assurance Company;
- 2) East Coast Erectors;
- 3) J & R of Delaware;
- 4) Am Quip Corp.;
- 5) Steel Suppliers Erectors, Inc.

MICHAEL A. PEDICONE, P.A.

By: /s/ Michael A. Pedicone  
Michael A. Pedicone, Esquire (No. 2424)  
109 W. 7<sup>th</sup> Street  
P.O. Box 1395  
Wilmington, DE 19899  
(302) 652-7850  
Attorney for Defendants

Dated: January 30, 2007

**\*THIS IS A RECORDS DEPOSITION ONLY. PERSONAL APPEARANCE WILL BE WAIVED IF  
REQUESTED MATERIAL IS RECEIVED IN ABOVE OFFICE ON OR BEFORE JANUARY 15, 2007.**



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FINANCIAL SERVICE VEHICLE TRUST,	)	
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Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on January 30, 2007, I electronically filed a Notice of Deposition  
Duces Tecum with the Clerk of the Court using CM/ECF which will send notification of such  
filing(s) to the following:

David P. Cline, Esquire (No 2681)  
1300 N. Market Street  
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Wilmington, DE 19801  
(302) 529-7848  
Attorney for Plaintiffs

MICHAEL A. PEDICONE, P.A.

By: /s/ Michael A. Pedicone  
Michael A. Pedicone, Esquire (No 2424)  
109 W. 7<sup>th</sup> Street  
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Attorney for Defendants

Dated: January 30, 2007